

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:16 CR 219 JAR SPM
)
HURLEY WALLACE,)
)
Defendant.)

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Sayler A. Fleming, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with being a felon in possession of ammunition, in violation of Title 18, United States Code, Section 922(g).
2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.
3. There is a serious risk that the defendant will flee.
4. There is a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness or juror.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

/s/ Sayler A. Fleming
SAYLER A. FLEMING, #58775MO
Assistant United States Attorney